

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-11578 PBS

FIREMAN'S FUND INSURANCE COMPANY
As Subrogee of Hodan Properties, Inc.,

Plaintiff

v.

FIRE SYSTEMS, INC., FIRE SUPPRESSION
SYSTEMS OF NEW ENGLAND, INC., PRO
CON, INC., and PAQUETTE ELECTRIC
COMPANY, INC.

Defendants

**DEFENDANT PAQUETTE ELECTRIC COMPANY, INC.'S
OBJECTIONS TO PROPOSED WITNESS AND EXHIBIT LISTS**

Defendant objects to the following witnesses and exhibits on the grounds stated, among others:

Plaintiff's Witnesses

1. James G. DiChaira: Untimely and inadequate expert disclosure.
2. Doug Maxwell: Untimely and inadequate expert disclosure.

Plaintiff's Exhibits

6. Fungal Remediation Plan: Foundation, non-disclosure of expert.
10. Sworn Statement of Loss "Building": Foundation, non-disclosure of expert.

11. Sworn Statement of Loss "Contents": Foundation, non-disclosure of expert.
13. Contents Inventory: Foundation, non-disclosure of expert.
15. Covino Invoices: Foundation, non-disclosure of expert.
16. Envirotech Invoices: Foundation, non-disclosure of expert.
18. Purchase Orders for Replacement Items: Foundation, non-disclosure of expert.
19. Mobile Mini Invoices: Foundation, non-disclosure of expert.
33. Papetti December 23, 2005 Report: Incomplete, report not admissible in addition to or in lieu of expert testimony.
34. Draft Detail Report: Foundation, non-disclosure of expert.
35. Business Income Loss Summary: Foundation, non-disclosure of expert.
36. Business Income and Extra Expense Summary: Foundation, non-disclosure of expert.
37. Statement of Loss: Foundation, non-disclosure of expert.
38. Swerling Adjustment Report: Foundation, non-disclosure of expert.
39. Stoner Invoice and Estimates: Foundation, non-disclosure of expert.
41. Business Income Statement of Loss: Foundation, non-disclosure of expert.

Respectfully submitted,

PAQUETTE ELECTRIC COMPANY, INC.
By its Attorneys,

Date: August 29, 2006

s/ David D. Dowd,

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Certificate of Service

I, David D. Dowd, hereby certify that I served a true and correct copy of the foregoing pleading electronically to:

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Date: August 29, 2006

s/ David D. Dowd,

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